

REMARKS

The Examiner has rejected claims 7 and 17-20 for lack of enablement and states that the specification does not enable "tactile stimulation." The Applicants believe the Examiner misunderstands the enablement requirement. Clearly, the first four words of claim 1 enable tactile stimulation. Claim 1 begins: "A touch screen display". The Applicants assert that this alone enables a person skilled in the art to understand that we are talking about tactile stimulation of a display screen. The specification is replete with references to "touch screen, tactile stimulation" which are too numerous to mention. The Examiner may possibly be under the mistaken understanding that if language in the claim is not verbatim in the specification, there is lack of enablement. This is not the law. Even if it were the law, the Examiner's attention is directed to original claim 17 where these terms of "tactile stimuli" and "tactile stimulation" were used. The Applicants respectfully request that the Examiner go to Examiner Hjerpe and ask him if the specification enables "tactile stimulation." We are confident that Examiner Hjerpe will agree.

The rejection for lack of enablement is utterly without merit and should be removed.

The Examiner has rejected all of the claims under sections 102 or 103 based either solely or at least in part upon the Miwa reference.

The Examiner either mischaracterizes the Miwa reference or grossly misreads the claims.

With respect to claim 1, the Examiner states that item 10 on the photocopy machine of Miwa is a liquid crystal panel. Indeed, this appears to be what item 10 is. A visual inspection of the liquid crystal panel 10 also reveals that it does have a periphery. Unfortunately, the Examiner now goes awry. The Examiner states that Miwa shows a periphery. However, the Applicants are not claiming just any "periphery." The Applicants are claiming a PERIPHERY OF THE VIEWING AREA OF THE LIQUID CRYSTAL PANEL.

The Examiner ignores these absolutely key limitations which are present in each and every claim.

The sensors cited by the Examiner are not around the periphery of the liquid crystal panel 10. The sources of the vibrations detected by the sensors do not originate from the liquid crystal panel.

In short, Miwa fails to teach a liquid crystal panel with sensors around its periphery configured to detect vibrations from the interior of the liquid crystal panel. Therefore, Miwa does not anticipate claim 1. Since claims 2-4 depend from claim 1, they also are not anticipated by Miwa as a matter of law.

Now referring to claim 11, the Examiner makes the same mis-characterization of Miwa with respect to claim 11 as was done with claim 1. The Examiner says that element 10 is the viewing area of liquid crystal material display panel.

Then the Examiner ignores key aspects of the following limitation:

**"tapping a first location ON SAID VIEWING AREA
and thereby generating a shockwave."**

The Examiner appears to ignore the word "SAID". The Examiner appears to read the claim as if it said "on a viewing area." i.e., on any viewing area. When the Applicants limit the claims to tapping a first location on SAID viewing area, it means the very same viewing area discussed earlier in the claim, namely the viewing area of the liquid crystal display panel. The Examiner cannot ignore this key distinction.

Because of this error, the rejection of claim 11 is improper and should be removed.

As a matter of law, if a reference fails to anticipate the independent claim, it fails to anticipate all claims that depend from it. The rejection of claims 11-15 should be removed.

The Examiner makes the very same error with respect to claim 17 -- citing item 10 as the liquid crystal panel, and then citing the periphery of something else. The Examiner cannot ignore the word "SAID" in the claims.

In summary, the shortcoming of Miwa is critical to all of the Examiner's art rejections because none of the additional cited references are even cited as teaching these shortcomings.

Miwa does not anticipate the claims, and the combinations of cited references fail to make a prima facie case of obviousness because they fail to

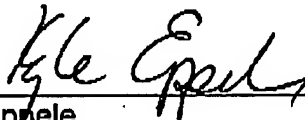
consider, address and make arguments with respect to all of the claim limitations. To leave out one limitation, i.e., to treat the word "SAID" the same as the word "A", is a failure to examine the claim as a whole and is improper.

Every one of the Examiner's art rejections is based upon this mis-characterization of Miwa or this misreading of the claims and, therefore, every one of the art rejections must be removed.

Since the Applicants have made no amendments to the claims, any new grounds for rejection must again come in the form of a non-final rejection.

The Applicants believe the application is in condition for allowance, and early notification of the same would be expected.

Respectfully submitted,



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